Case 1:19-cv-02106-CFC Document 37-1 Filed 04/05/21 Page 1 of 8 PageID #: 3246 Robert E. Saint, Esq.

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April 5, 2021

Invoice submitted to:

Amy M. Patrick, M.D. 106 Indiana Spring Road Kennett Square, PA 19348

Robert E. Saint, Esq.

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DESCRIPTION

		a	Hours
	RES RES	Final Revisions to Complaint.	2.30 1.00 0.10 0.10
10/10/2019 -	RES RES	Phone Conference with Nancy Haile.	0.10 0.10 0.10
10/14/2019 <i>-</i> 10/17/2019 <i>-</i>	RES	Email to Amy Patrick and Mark Baumel. Phone Conference with Randall Robbins.	0.10 0.10 0.30 0.50
()	RES		0.40
10/22/2019 -	RES	Email to Randall Robbins and Email to Mark Baumel and Amy Patrick.	0.10
10/28/2019 - 10/30/2019 -		10/28 - 10/29/19 - Emails to Randall Robbins. Reviewed Emails from Randall Robbins, Reviewed Complaint and Email to Randall Robbins.	0.10 0.20
11/1/2019 -	RES		0.30
11/4/2019 -	RES		1.20
		Email to Mark Baumel and Amy Patrick.	0.10
11/6/2019 -	RES RES		0.10 0.20
11/7/2019 -	RES		0.40
11/11/2019 - 12/3/2019 -	RES ¹	Email to Brittany Petrucci with Copy to Randall Robbins.	0.10 0.20
12/9/2019 -	RES	Email to Brittany Petrucci, Reviewed Answer, Emaili to Amy Patrick and Mark Baumel with Attachment, another Email to Amy Patrick and Mark Baumel and Letter to Amy Patrick and	0.50
-		Mark Baumel.	

Case 1:19-cv-02106-CEC Document 37-1 Filed 04/05/21 Page 3 of 8 PageID #: 3248 Amy M. Patrick, M.D.

3 // 33/12 /			Hours
12/12/2019 -	RES	Prepared Motion and Proposed Order for Appearance Pro Hac Vice and Prepared Registration, Emailed to Randall	0.70
12/13/2019 -	RES	Robbins and Brittany Petrucci. Email to Brittany Petrucci and Email to Amy Patrick and Mark	0.10
12/18/2019 - 12/31/2019 -	RES RES	Baumel. Email to Randall Robbins with Attachments. Correspondence to Randall Robbins with Enclosure. Prepared and Filed Appearance in Delaware District Court. Email to Michael Logullo with Copy to Randall Robbins. Prepared Draft Agreed Scheduling Order. Email to Michael Logullo with Attachment and Copy to Randall	0.10 0.20 0.20 0.10 1.00 0.20
1/3/2020 -	RES	Robbins. Revisions to Scheduling Order and Email to Randall Robbins	0.20
- 1/7/2020 - -	RES RES RES	and Email to Amy Patrick and Mark Baumel. Email to Amy Patrick and Mark Baumel. Phone Conference with Randall Robbins. Reviewed Documents From Reliance Claims File and Two (2) Emails to Randall Robbins.	0.10 0.40 1.00
	RES		0.20
1/8/2020 - -	RES RES	Email to Mike Logullo. Reviewed and Revised Scheduling Order and Email to Mike Logullo.	0.10 0.10
1/12/2020 -		Email to Michael Logullo.	0.10 1.20
1/13/2020 -	RES	Revised Scheduling order and Two (2) Emails, Voice Mail to Brittney (at Randall Robbins' Office) and Email to Randall Robbins.	0.40
	RES RES	Phone Conference with Randall Robbins. Voice Mail to Mike Logullo. Phone Conference with Mike Logullo. Phone Conference with Josh Bachrach. Voice Mail to Josh Bachrach and Phone Conference with Josh	0.10 0.10 0.10 0.10 0.20
(#)	RES	Bachrach. Prepared Joint Motion to Approve Scheduling Order with Edits	1.50
1/14/2020 -	RES		0.20
1/16/2020 -	RES	and Two (2) Emails to All Attorneys. Email to Mark Baumel and Amy Patrick and Two (2) Emails to	0.30
-	RES		0.20
2/3/2020 -	RES	Questions. Reviewed Materials in Advance of Call and Conference Call with Court, Phone Conference with Randall Robbins, Emails to Amy Patrick and Mark Baumel and Email to Michael Lugullo.	0.70
2/10/2020 -	RES		0.20
2/24/2020 -	RES	Email to Josh Bachrach and Michael Logullo. Email to Josh Bachrach and Michael Lugullo. Phone Conference with Heather Austin.	0.10 0.10 0.10
2/27/2020 - 2/28/2020 -		Email to Mark Baumel and Amy Patrick. 02/28 - 02/29/20 Reviewed Entire Record (2,600 pages) and Copied Select Portions.	0.10 3.40
3/2/2020 - 3/3/2020 - 3/4/2020 - 3/5/2020 - 3/6/2020 -	RES RES RES	Further Work on Mediation Statement. Research Regarding Mediation Statement. Work on Draft of Confidential Mediation Statement. Further Work on Draft of Confidential Mediation Statement. Research and More Work on Confidential Mediation	0.30 1.20 6.20 4.10 5.20
*	RES	Statement. Edits and Additions to Confidential Mediation Statement and Emailed to Mark Baumel and Amy Patrick.	1.60

Amy M. Patrick, M.D. Robert E. Saint, Esq. 04/05/21

04/00/21		2 ·	Hours
3/9/2020 -	RES	Further Work on Plaintiff's Confidential Mediation Statement, Research and Edits and Email to Amy Patrick, Mark Baumel	4.20
	RES RES	Further Edits to Plaintiff's Confidential Mediation Statement. Phone Conference with Amy Patrick and Mark Baumel. Final Edits and Email to Randall Robbins with Separate Edits	0.60 1.60 0.40 4.30
<u></u>	RES	to Amy Patrick and Mark Baumel. Reviewed Mark Baumel's Changes & Revisions to Confidential Mediation Statement and Email to Amy Patrick and Mark Baumel.	0.10
3/11/2020 -	RES	Final Edits on Confidential Mediation Statement, Prepared Letter from Randall Robbins to Magistrate Mary Pat Thynge and Emails to Randall Robbins and Brittney.	1.40
3/16/2020 - 4/1/2020 - 4/6/2020 -	RES	Email to Amy Patrick and Mark Baumel.	0.10 0.10 0.20
-	RES	Reviewed Administrative Record and Email to Heather Austin and josh Bachrach with Copy to Randall Robbins.	1.00
4/7/2020 -	RES		0.60
4/8/2020 -	RES	Two (2) Emails to Randall Robbins and Email to Heather Austin and Josh Bachrach.	0.50
4/9/2020 -	ŔES	Reviewed Administrative Record, Filing and Email to Legal	0.20
4/17/2020 - - - -	RES RES	Email to Amy Patrick and Mark Baumel. Phone Conference with Paul Sadler. Another Email to Amy Patrick and Mark Baumel. Email to Michael Logullo and Josh Bachrach and Additional	0.20 0.10 0.50 0.10 0.10
4/20/2020 - 4/22/2020 - 4/23/2020 - 5/22/2020 - 5/26/2020 -	RES RES RES	Reviewed Brief and Email to Amy Patrick and Mark Baumel. Email to Josh Bachrach and Heather Austin. NML - Reviewed Lengthy correspondence Regarding	0.10 0.10 0.10 0.20 0.20 0.20 0.30
s a s	RES	Quantitative Reduction as a total Disability and Email to Mark Baumel and Amy Patrick. Reviewed Lengthy Correspondence Regarding Quantitative Reduction as a Total Disability and Email to Mark Baumel and	0.30
5/28/2020 -	RES	Amy Patrick. Draft of Petition to Supplement Administrative Record and Research.	1.20
5/29/2020 - 6/1/2020 - -	RES:	Reviewed Emails and Email to Josh Bachrach and Others. Revisions to Petition to Supplement Administrative Record. Phone Conference with Randall Robbins.	0.20 0.30 0.10 0.10 0.10
6/2/2020 - - 6/3/2020 -	RES RES RES	Emails to Amy Patrick, Mark Baumel and Randall Robbins. Reviewed Materials in Advance of Settlement Conference. ZOOM Conference with Amy Patrick, Mark Baumel and Randall Robbins.	0.10 0.90 0.80

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			Hours
6/3/2020 -		Email to Amy Patrick and Mark Baumel with Attachment, Reviewed Present Value Calculation and Email to Amy Patrick	0.10 0.40
6/4/2020 -	RES	Reviewed Materials in Advance of Mediation. First Session of Mediation (Morning).	0.10 1.00 2.50
	RES RES	Research for Motion for Summary Judgment. Research and Email to Amy Patrick and Mark Baumel.	3.00 0.70 0.60 1.60 0.30
6/10/2020 - 6/15/2020 -		Attachment. Email to Brittany Petrucci and Randall Robbins. Reviewed and Outlined Entire Agreed Record, Partial Draft of	0.10 9.70
6/16/2020 -	RES		8.50
6/17/2020 -	RES	Brittany @ Ashby-Geddes. Research, Further Dratting of Brief, Editing of Brief, Emails to Brittany (Ashby-Geddes) and Conferences with Legal Assistant.	9.50
6/18/2020 -	RES		4.20
¥	RES		2.30
6/19/2020 -		Two (2) Emails to Amy Patrick. Reviewed U.S. District Court for the District of Delaware's Local Rules and Revised Brief to Conform with Local Rules,	0.20 1.30
6/29/2020 -	RES	Emails to Legal Assistant and Email to Randall Robbins. Reviewed Defendant's Brief and Statement of Material Facts, Reviewed Scheduling Order and Downloaded and Copied, and Partial Review of Cases Cited in Defendant's Brief.	2.90
-	RES		1.70
6/30/2020 -	RES	Initial/Preliminary Draft of Concise Statement in Opposition to Reliance's Concise Statement and Reviewed Reliance's Citations to the Record.	0.50
7/2/2020 -	RES		3.80
7/6/2020 - 7/7/2020 - 7/8/2020 - 7/9/2020 -	RES	Research and Brief Writing. Further Research and Brief Writing. Research, Brief Writing and Editing. Further Work on Brief in Opposition to Reliance's Motion for	2.60 2.10 7.20 4.90
7/10/2020 -	RES		1.20
7/13/2020 - 7/14/2020 -	RES	Opposition) and Further Research. Further Drafting and Editing of Brief in Opposition. Revised Brief in Opposition. Worked on Brief in Response (Opposition), Multiple Edits and Email to Randall Robbins.	3.20 1.80 3.60
7/15/2020 - - - 7/26/2020 - 7/27/2020 - 7/28/2020 -	RES RES RES RES RES RES	Further Revisions on Brief in Opposition. Email to Randall Robbins. Further Edits to Brief in Opposition. Reviewed Reliance's Opposing Brief and Reviewed Cases. Work on Reply Brief and Research.	1.00 0.10 0.90 1.70 1.80 1.20

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		_	Hours
7/28/2020 -			2.80
7/29/2020 -	RES	Further Work on Reply Brief. More Work on Reply Brief.	3.20 1.00
·=	RES	Additional Work on Reply Brief.	1.10
7/30/2020 -	RES	Further Work on Reply Brief and Research.	3.00
	RES	Email to Randall Robbins. Edited Reply Brief.	0.10 2.30
7/31/2020 -			1.80
5≝	RES	Prepared Proposed Order.	0.20
	RES	Prepared Plaintiff's Concise Statement of Material Facts in	0.30
*	RES	Support of Motion for Summary Judgment. Prepared Summary of Agreement and Edits.	0.80
:=:		Further Edits and Attempts to File within Ten (10) Page	0.30
	DEO	Limitation.	0.00
	RES	Revisions to Table of Contents and Table of Authorities. Quick Review of Draft Reply Brief, Email to Randall Robbins	0.20 0.20
	INLO	(with copy to Brittany) with Attachment and Email to Amy	0.20
		Patrick and Mark Baumel with Attachment.	
8/2/2020 -	RES		0.10
8/3/2020 -	RES	Email to Amy Patrick and Mark Baumel. Reviewed Reply Brief and Made Revisions, Re-Read Reply	1.30
		Brief and Circulated to Mark Baumel and Amy Patrick and	
	D.E.O.	Multiple Emails to Randall Robbins and Brittany.	- 4-
-	RES	Two (2) Emails to Brittany and Randall Robbins. Phone Conference with Brittany (Ashby-Geddes).	0.10 0.10
1/7/2021 -	RES	Email to Randall Robbins.	0.10
-		Voice Mail to Randall Robbins and Phone Conference to	0.50
	DEO	Randall Robbins (Reliance Standard).	0.40
-	RES	Email to Mark Baumel and Amy Patrick. Email to Randall Robbins.	0.10 0.10
		Two (2) Emails to Michael Lugullo with Copy to Randall	0.10
		Robbins.	
1/9/2021 -	RES	(Reliance Standard) Partial Review of Briefs. Email to Mark Baumel and Amy Patrick.	0.50 0.10
1/15/2021 -	RES	(Reliance) Phone Conference with Amy Patrick and Mark	0.10
		Baumel.	
1/19/2021 - 1/21/2021 -	RES RES	(Reliance) Email to Mark Baumel and Amy Patrick.	0.10
		(Reliance) Email to Brittany Petrucci. (Reliance) Phone Conference with Brittany Petrucci.	0.10 0.20
.00	RES	Emails to Randall Robbins.	0.10
2/5/2021 -	RES	(RSL) Email to Mark Baumel and Amy Patrick.	0.10
~	RES	(RSL) Email to Randall Robbins, Mark Baumel and Amy Patrick.	0.10
	RES	(RSL) Organized Materials for Oral Argument and Partially Reviewed Cases and Partially Reviewed and Printed Cases.	1.80
	RES	(RSL) Further Review of Cases.	0.30
) =	RES	(RSL) Email to Randall Robbins, Amy Patrick and Mark	0.10
2/7/2021 -	RES	Baumel. (RSL) Further Review of Briefs and Cases in Preparation of Oral Argument.	1.50
-	RES	(RSL) Further Review of Case Law in Preparation of Oral Argument.	0.90
	RES	(RSL) Further Preparation for Oral Argument.	2.20
2/9/2021 -	RES	Emails to Randall Robbins, Amy Patrick and Mark Baumel.	0.10
57/	KES	Further Preparation for Oral Argument and Conferences with Law Clerk (T.Y.).	3.60
2/10/2021 -	RES	Further Preparation for Oral Argument and Conference with	3.10
		Law Clerk (T.Y.).	
-	RES	Conference Call with Amy Patrick, Mark Baumel and Randall Robbins and Subsequent Conference Call with Randall Robbins.	1.40
		NODDIHS.	

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			Hours
2/10/2021 - 2/11/2021 -		(RSL) Further Review of documents and Preparation for Oral	1.00 0.70
	RES		2.70
-	RES	, , ,	1.80
2/12/2021 -	RES		2.80
3/19/2021 -	RES	with Randall Robbins and Oral Argument. Phone Conference with Randall Robbins and Phone Conference with Amy Patrick.	0.50
3/21/2021 -	RES	Two (2) Emails to Randall Robbins in Reply to His Two (2) Emails.	0.10
i a	RES	Research Regarding Stay of Order Pending an Appeal and Email to Amy Patrick and Mark Baumel with Copy to Randall Robbins.	0.80
3/22/2021 -	RES	Read Court's Opinion, Conference with Law Clerk (T.Y.) and Email to Randal Robbins.	1.10
3/23/2021 -	RES RES	Reviewed Policy and Email to Amy Patrick and Mark Baumel.	0.20 0.80
:= :=	RES RES	Phone Conference with Randall Robbins About Stay Issue.	0.30 0.20
	RES RES	Email to Randall Robbins and Randall Teti. Prepared Correspondence to Josh Bachrach and Email to	0.10 0.40
	RES	Amy Patrick and Randall Robbins/Also, Revisions to letter. Conference with Law Clerk (T.Y.) and Research Regarding Court's Authority to Hear Fee Petition for Fees After Notice of Appeal is Filed.	1.10
~	RES		0.40
#	RES	Phone Conference with Mark Baumel About Northwestern Mutual (NWM) Moving Forward.	0.40
3/24/2021 -	RES RES	Email to Randall Robbins Regarding Jurisdictional Issue. Reviewed Pensecio Case and Checked to See If It Was Good Law, Conference with Law Clerk (T.Y.), Revised Josh Bachrach Letter and Email to Client and Randall Robbins.	0.10 0.50
(5)	RES	Reviewed Randal Teti's Email, scanned Document and Email to Randall Teti with Copy to Randall Robbins.	0.20
*	RES	Read the Unisys Corp and Christian Cases and Research Regarding Petition for Fees, Preliminary Review of the Hardt and Ursic Cases and Cursory Research on Filing a Fee Petition.	1.10
3/25/2021 -	RES	Research Regarding Fee Petition and Voice Mail to Randall Robbins.	0.50
-	RES	Conference Call With Randall Robbins and Randal Teti Regarding Fee Petition and Jurisdiction.	0.30
-	RES RES	Prepared Detailed Fee Petition and Research. Phone Conference with Randall Robbins, Email to Josh Bachrach with Attachment in Response to Request to Agree to a Stay with Copy to Randall Robbins and Randall Teti and	4.80 0.20
3/26/2021 -	RES RES	Forwarded to Amy Patrick. Email to Josh Bachrach. Email to Randall Robbins About Our Counter to Josh	0.10 0.10
3/27/2021 -	RES	Bachrach Regarding the Stay. Two (2) Emails to Amy Patrick, Including Email From Josh Bachrach with Copies to Randall Robbins and Separate Email to Randal Robbins.	0.20
3/29/2021 -	RES		0.10

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		H	lours
	RES Conference with Law Clerk (T.Y.) Regarding Stay of Future Benefits Pending Appeal.		0,10
3/30/2021 - R	RES Completed and Revised Supplemental Petition For Attorneys' Fees, Legal Research and Emailed to Randall Robbins and Randall Teti.	E (C	1.30
- R	RES Prepared Affidavit of Robert Saint and Emailed to Randall Robbins and Randall Teti.		0.80
	ES Voice Mail to Randall Robbins Regarding Reliance Proposal for a Stay.		0.10
- R	ES Phone Conference with Randall Robbins About the Stay. ES Email to Amy Patrick and Mark Baumel Regarding Amy's Earnings for Purposes of the Bond.		0.20 0.10
- R	ES Email to Josh Bachrach About Amy's Earnings and Bond. ES Multiple Emails with Clients About Reliance's Stay of Proceedings and Bond.	×,,	0.10 0.20
⇒ R	ES Email to Josh Bachrach with Copy to Randall Robbins and Randall Teti.		0.10
4/1/2021 - RI = RI	ES Email to Josh Bachrach. ES Phone Conference with Randall Robbins About Josh		0.10
	Bachrach's Email and the Security Issue. ES Email to Amy Patrick Which Forwards and Discusses Josh		
- RF	Dacinacit's Email.		0.20
	Robbins Regarding Stay/Security		0.50
4.0.00	District Court to COA in ERISA Disability Case	124	0.50
4/2/2021 - RE	ES Email to Josh Bachrach Regarding Stay/Security.		0.10
		21!	5.80

Additional Charges

		Qty/Price
11/4/2019 - RES	Expense: Filing Fees.	1
12/12/2019 - RES	Expense: Registration Fee for Admission Pro Hac Vice (Randall Robbins).	400.00 1 25.00
Total cos	425.00	